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Reblewski -- 10/824,489
Atty. Docket No.: 003921.00008

REMARKS

Reconsideration and allowance are respectfully requested. No new matter is added by this Amendment.

Claims 1, 2, and 4-10 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,907,697 to Barbier, et al. ("Barbier," which is a CIP of the Barbier reference previously asserted). Claim 3 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Barbier in view of alleged common knowledge. Applicant respectfully traverses these rejections in view of the amendments and remarks herein.

Independent Claim 1

Independent claim 1 as amended recites for each of a plurality of groups of simulation processors, a corresponding one of a plurality of first reconfigurable interconnect stages each having a plurality of inputs coupled to the outputs from only the corresponding group of simulation processors, and further having a plurality of outputs; and for each of the first reconfigurable interconnect stages, a corresponding one of a plurality of second reconfigurable interconnect stages each having a plurality of inputs coupled to a first subset of the outputs from only the corresponding first reconfigurable interconnect stage, and further having a plurality of outputs, wherein a first subset of the outputs from each second reconfigurable interconnect stage are coupled to a first subset of the inputs of only the corresponding first reconfigurable interconnect stage via a plurality of feedback paths.

The Office Action compares the recited first reconfigurable interconnect stage with crossbar network stage 0 (elements 114a and 114b of Fig. 3 and crossbar 230 on the left side of Fig. 7) of Barbier, the recited second reconfigurable interconnect stage with crossbar 631 of Barbier (Fig. 7), and the recited third reconfigurable interconnect stage with crossbar 230 (right side of Fig. 7).

However, Barbier does not teach or suggest that each of a plurality of crossbars 631 has inputs only from one of the corresponding crossbars 230 on the left side of Fig. 7. Thus, Barbier does not teach or suggest the plurality of second reconfigurable stages each having a plurality of inputs coupled to the outputs from only the corresponding first reconfigurable interconnect stage, as

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now claimed.

For at least this reason, it is submitted that amended claim 1 is allowable over Barbier.

Independent Claim 4

Independent claim 4 as amended recites a third reconfigurable interconnect stage configurable to receive a second plurality of outputs of a second reconfigurable interconnect stage and to provide outputs back to inputs of clusters that include simulation engines. An example of this configuration is described in Applicant's specification, e.g., at p. 17, paragraph 52.

The Office Action compares the third reconfigurable stage with crossbar 230 on the right side of Fig. 7 in Barbier, and the clusters of simulation engines with LE array 102 of Barbier. However, crossbar 230 on the right side of Fig. 7 does not provide outputs back to LE array 102. Thus, Barbier does not teach or suggest the third reconfigurable interconnect stage as now claimed.

For at least this reason, it is submitted that amended claim 4 is allowable over Barbier.\

Independent Claim 6

It is submitted that amended claim 6 is also allowable for at least similar reasons as those discussed above with regard to claim 4.

Independent Claim 8

It is submitted that amended claim 8 is also allowable for at least similar reasons as those discussed above with regard to claim 1.

Dependent Claims

The dependent claims are also allowable by virtue of depending from allowable independent claims, and further in view of the additional features recited therein.

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Conclusion

All rejections having been addressed, it is submitted that the present application is in condition for allowance, and notice to that effect is respectfully requested. Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the number below.

Respectfully submitted,

BANNER & WITCOFF, LTD.

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By: /Ross Dannenberg/ Reg. No. 49,024 for
Jordan N. Bodner
Reg. No. 42,338
1100 13th Street, NW
Suite 1200
Washington, D.C. 20005
Telephone: (202) 824-3000
Facsimile: (202) 824-3001